

## Exhibit 2

**From:** [Andrew Stephens](#)  
**To:** [zzz.External.dashby@omm.com](#); [Raymond Winter](#); [Lollar, Tirzah](#); [Margolis, Craig D.](#); [zzz.External.lgodesky@omm.com](#); [zzz.External.jchapa@omm.com](#); [Martin, Meghan C.](#); [Pieper, Megan](#); [Odell, Christopher M.](#); [brown@blackburnbrownlaw.com](#); [zzz.External.rgalin@omm.com](#)  
**Cc:** [Heather Hacker](#); [Eugenia Krieg](#); [Sinty Chandy](#); [Amy Hilton](#); [Christopher Hilton](#); [Drew Wright](#); [Mark Einfalt](#); [Kris Kennedy](#); [Kathryn Allen](#); [Amanda Byrd](#); [Jennifer Rowell](#); [Janice Garrett](#); [Rhonda Rodriguez](#); [Michael Moore](#)  
**Subject:** RE: Planned Parenthood: depositions  
**Date:** Tuesday, November 15, 2022 9:26:25 PM  
**Attachments:** [image001.png](#)

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External E-mail

Danny, Tirzah,

We reviewed your letter and chart concerning the 30(b)(6) notices served on Defendants. We do not agree with the objections or limitations described in the "Scope" section of your chart and expect Defendants to present witnesses who are prepared to testify regarding the topics as noticed.

Andrew

**Andrew B. Stephens**

Partner

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**From:** Ashby, Danny S. <[dashby@omm.com](mailto:dashby@omm.com)>

**Sent:** Wednesday, November 2, 2022 8:13 PM

**To:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Godesky, Leah <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; Chapa, Justin R. <[jchapa@omm.com](mailto:jchapa@omm.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; brown@blackburnbrownlaw.com; Galin, Ross B. <[rgalin@omm.com](mailto:rgalin@omm.com)>

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**Subject:** RE: Planned Parenthood: depositions

Hi Ray and Andrew -

Per our discussions on Monday and our prior meet and confer, attached is the chart and letter I promised you about the 30b6 topics to Defendants. We've combined our positions for convenience given the significant overlap between the topics to each Defendant. We look forward to discussing this with you once you've had a chance to review. And for your requested meet and confer regarding the topics below, Tirzah and I compared calendars and are available any time after 2 CT tomorrow. Thanks.

Danny

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**From:** Raymond Winter <[Raymond.Winter@oag.texas.gov](mailto:Raymond.Winter@oag.texas.gov)>  
**Sent:** Wednesday, November 2, 2022 1:43 PM  
**To:** Ashby, Danny S. <[dashby@omm.com](mailto:dashby@omm.com)>; Lollar, Tirzah <[Tirzah.Lollar@arnoldporter.com](mailto:Tirzah.Lollar@arnoldporter.com)>; Margolis, Craig D. <[Craig.Margolis@arnoldporter.com](mailto:Craig.Margolis@arnoldporter.com)>; Godesky, Leah <[lgodesky@omm.com](mailto:lgodesky@omm.com)>; Chapa, Justin R. <[jchapa@omm.com](mailto:jchapa@omm.com)>; Martin, Meghan C. <[Meghan.Martin@arnoldporter.com](mailto:Meghan.Martin@arnoldporter.com)>; Pieper, Megan <[Megan.Pieper@arnoldporter.com](mailto:Megan.Pieper@arnoldporter.com)>; Odell, Christopher M. <[Christopher.Odell@arnoldporter.com](mailto:Christopher.Odell@arnoldporter.com)>; [brown@blackburnbrownlaw.com](mailto:brown@blackburnbrownlaw.com)  
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**Subject:** Planned Parenthood: depositions

[EXTERNAL MESSAGE]

Danny and Tirzah,

The State would like to confer with you regarding your requests for the depositions of Ghahremani and Bowen. Please let me know your availability.

We are still working on making contact with Ghahremani (a former Medicaid director) but would ask that you refrain from attempting to serve her for now. I will let you know promptly if we represent her. Regardless, the State does not agree that Ghahremani is within the scope of discovery and we reserve the right to move for protection and/or to quash her deposition.

The State represents Bowen in this matter, so please ask your process server to stand down. We will accept a subpoena for Bowen, although we do not agree he is within the scope of discovery. We reserve the right to move for protection and/or to quash your deposition subpoena for Bowen.

We intend to depose Ms. Trivassano on Nov. 15<sup>th</sup> in Florida via zoom. We would like to set aside time in advance of that deposition to discuss the zoom logistics. Please let me know your availability.

Finally, the State will present our witnesses in response to your 30(b)(6) notices to “HHSC” and “Texas” on Dec. 6<sup>th</sup> and 7<sup>th</sup> at the Office of Attorney General in Austin. We will present two witnesses as follows:

Witness 1 – Starting 12/6/22: topics 1, 2, 3a-3f, 9, 13, 14, 16, 17, 18, 20, 21, 22, 23, 24, 31, 32, 33; and

Witness 2 – starting 12/7/22 (or afternoon of 12/6, TBD): topics 3g, 4, 5, 6, 7, 8, 10, 11, 12, 13, 14, 15, 19, 25, 26, 27, 28, 29, 30, 31, 32; and also the unique topics on “Texas” notice: 1, 2, 7, 16, 33, and 36.

Note: for the topics in the “Texas” notice that are duplicates of topics in the notice directed to “HHSC” the State designates the testimony of Witness 1 and 2. Thank you.

Best regards,

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